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15 Attorneys for Plaintiff  
16 PATAGONIA, INC.

17 **UNITED STATES DISTRICT COURT**  
18 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**  
19 **WESTERN DIVISION – LOS ANGELES**

20 PATAGONIA, INC.,  
21 Plaintiff,

22 v.

23 FRANCES AGNEW DBA FRAN  
24 CALISTA, FRAN CALISTA  
25 CLOSET LLC, ALL THINGS ALI,  
26 LLC, ORC SHOP LLC, ALISON  
27 RAE FEASTER, BROOKE L.  
28 HUNSUCKER DBA BROOKE  
LEANN ALLEN, BAILEY RENAE  
MILLER, JEFFREY FRANCIS  
MOORE, LEE WILLIAM,  
COLSON TY AGNEW, PUTIAN  
LOMANDO TRADING CO., LTD  
AND DOES 1-10,

Defendants.

Case No.: 2:25-cv-03283

**DECLARATION OF PAYMANEH  
PARHAMI IN SUPPORT OF  
PLAINTIFF PATAGONIA, INC.'S  
APPLICATION FOR TEMPORARY  
RESTRAINING ORDER AND ORDER  
TO SHOW CAUSE**

**UNREDACTED VERSION OF  
DOCUMENT PROPOSED TO BE  
FILED UNDER SEAL**

I, Paymaneh Parhami, declare:

1. I am an attorney admitted to practice in the State of California, and practice with the law firm of Verso Law Group LLP (“Verso”), attorneys of record for Plaintiff Patagonia, Inc. (“Patagonia”), in this proceeding. Except where other

1 sources of information are noted, I make this declaration based on my personal  
2 knowledge and, if called as a witness, I could and would competently testify thereto.

3 2. I make and submit this declaration in connection with Patagonia's *Ex*  
4 *Parte* Application for Temporary Restraining Order and Order to Show Cause for  
5 Why Preliminary Injunction Should Not Be Entered ("*Ex Parte* Application").

6 3. Verso is an Intellectual Property specialty firm focusing on brand  
7 protection. As part of my job, I advise various brands and companies, including  
8 Patagonia, on anti-counterfeiting and brand enforcement strategies. My colleagues  
9 and I have been involved in a large amount of infringement and counterfeiting  
10 matters for Patagonia and other major brands.

11 4. Verso represents Patagonia in intellectual property and litigation matters  
12 across the country. Verso has overseen and conducted (and continues to oversee and  
13 conduct) the investigation into Defendants' counterfeiting scheme, detailed in  
14 Patagonia's Complaint and *Ex Parte* Application.

15 5. The investigation revealed that Defendants are operating an international  
16 and widespread counterfeiting ring using Facebook "closed groups" and private  
17 Telegram channels.

18 6. On December 31, 2024, Patagonia received two seizure reports from  
19 U.S. Customs and Border Protection ("CBP") indicating that CBP had seized sixty  
20 (60) counterfeit goods bearing Patagonia's trademark(s). Patagonia promptly sent the  
21 seizure reports to Verso. I personally reviewed both seizure reports. Attached as  
22 **Exhibit 1** are true and correct copies of these seizure reports.

23 7. On January 9, 2025, I, on behalf of Patagonia, sent a letter to the  
24 importer identified on the seizure reports ("KGL"), informing her that importing  
25 counterfeit Patagonia products with the intent to sell to consumers is illegal and  
26 harmful to Patagonia's brand and reputation. In response to my letter, KGL informed  
27 me that she purchased the seized counterfeit Patagonia products using a Facebook  
28 closed group called "ORC Style Guide" on or around October to December 2024.

1 She admitted that this was not the only time she had purchased Patagonia-branded  
2 products through this Facebook group. KGL also informed me about a second closed  
3 Facebook group called “ORC Shop” that KGL believed to be related to the ORC  
4 Style Guide group.

5 8. KGL explained that both Facebook groups are private and invitation-  
6 only and are used to promote and sell purported brand name products, including  
7 Patagonia, Lululemon, and Tiffany and Company, at a significant discount to group  
8 members. Although KGL represented that she is not an administrator of the  
9 Facebook groups, KGL is a member of the ORC Style Guide group—allowing her to  
10 view posts made within the private group. Based on KGL’s membership in ORC  
11 Style Guide group and review of the posts and products advertised, KGL identified a  
12 person by the name of “Fran Calista” as the “ringleader of the whole operation” and  
13 one of the administrators of both the ORC Style Guide and ORC Shop Facebook  
14 groups.

15 9. KGL provided me with screenshots from the ORC Style Guide group,  
16 showing that Defendants Ali Feaster, Brooke Leann Allen, and Bailey Miller have  
17 promoted a large number of counterfeit Patagonia products within the group posts.  
18 Attached as **Exhibit 2** is a true and correct copy of these screenshots.

19 10. KGL further informed me that Fran Calista travels to China multiple  
20 times a year to go to factories to source products to sell through these private  
21 Facebook groups. KGL stated she knew this because Fran Calista posts on the ORC  
22 Style Guide group about her trips to China, including photos of herself at various  
23 Chinese factories. Attached as **Exhibit 3** is a true and correct copy of a Facebook post  
24 by Fran Calista about her travels to China, including a post asking members for  
25 product sourcing requests.

26 11. KGL also told me that Fran Calista stores products at multiple  
27 warehouses in Los Angeles and Atlanta, and that during the holiday seasons, Ms.  
28 Calista offers holiday promotions where she offers to ship consumers products from

1 the warehouses in the U.S. on an expedited basis (compared to the long shipping  
2 times from China).

3 12. KGL told me that she became aware of Patagonia-branded products  
4 being promoted on the ORC Style Guide group at the end of 2024. She stated that the  
5 way the ORC Style Guide group generally works (which was later confirmed by my  
6 and Patagonia's investigator's investigations) is that the administrators and  
7 moderators pretend to post "reviews" of branded products, and then in the comments  
8 sections, actually provide links to online storefronts hosted on AliExpress or Shopify  
9 where the counterfeit products can be purchased. Generally, the storefronts do not  
10 identify the product by brand name. However, KGL told me that when she purchased  
11 the Patagonia-branded products being promoted through the ORC Style Guide group  
12 using the linked online storefronts, she understood that the products she was  
13 purchasing would be Patagonia-branded. KGL also told me that the links to  
14 AliExpress and Shopify shops are frequently taken down, and new ones posted. This  
15 is consistent with my and Patagonia's investigator's observations as the web site links  
16 Patagonia's investigator used to make test buys have been disabled.

17 13. KGL promoted and sold some of the counterfeit Patagonia products she  
18 purchased through the ORC Style Guide group through her online store. Patagonia  
19 has entered into a settlement agreement with KGL. Among other terms, KGL has  
20 agreed not to purchase or sell counterfeit Patagonia products in the future.

21 14. Prior to speaking with KGL, Patagonia and Verso had no knowledge of  
22 Defendants' counterfeiting operation or the ORC Style Guide and ORC Shop  
23 Facebook groups since the groups are private and therefore all posts and/or comments  
24 are only visible to group members.

25 15. Through my own investigation, I discovered that the ORC Style Guide  
26 group has over 60,000 members and the ORC Shop group has nearly 114,000  
27 members.  
28

1           16. Based on my conversations with KGL, I had reason to believe that  
2 counterfeit Patagonia products were being offered for sale in both groups. This was  
3 partly based on the fact that KGL had told me that the ORC Shop group was  
4 administered by the same individuals as the ORC Style Guide group.

5           17. I contacted Patagonia's investigator (the "Investigator") and requested  
6 that Investigator become a member of both Facebook groups, review the posts and  
7 comments in both groups, and determine whether counterfeit Patagonia products  
8 were being sold and/or discussed by members and/or administrators of these groups.

9           18. On or about February 5, 2025, Investigator informed me that they were  
10 admitted to the ORC Style Guide group but not the ORC Shop group. It appears that  
11 the ORC Shop group has instituted an "adding freeze"—not admitting any new  
12 members to its current 114,000 membership.<sup>1</sup>

13           19. Through our investigation, we determined that the ORC Style Guide  
14 group was created on October 4, 2016, and has used various names over the years,  
15 including "AliExpress Teens and Tweens." A true and correct copy of ORC Style  
16 Guide's name history is attached as **Exhibit 4**.

17           20. As a member of ORC Style Guide, Investigator identified Fran Calista as  
18 an administrator of ORC Style Guide, confirming the information I received from  
19 KGL. Based on the investigation, Fran Calista is also known as Frances Marie  
20 Miller, Frances Agnew, Fran Agnew, Fran N. Agnew, and Frances M. Agnew  
21 (hereinafter referred to as "Defendant Frances Agnew").

22           21. As a part of the investigation, I instructed Investigator to determine the  
23 true identities of the individuals involved in promoting and selling counterfeit  
24 Patagonia products, and to locate their last known addresses. Investigator's report  
25 determined that Brooke Leann Allen's real name is Brooke L. Hunsucker, and that  
26

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27 <sup>1</sup> Our investigation revealed that the ORC Shop Facebook group rules direct members  
28 to download the AliExpress App and create an account in order to purchase  
counterfeit products.

1 Defendant Frances Agnew owns and operates multiple businesses, along with her  
2 partner, Jeffrey Moore, and her son, Colson Agnew: Fran Calista Closet LLC, ORC  
3 Shop LLC and All Things Ali, LLC—all of which are connected to the counterfeiting  
4 scheme.

5 22. According to the Florida Secretary of State records, Defendant Frances  
6 Agnew is the owner of the entities ORC Shop LLC, Fran Calista Closet LLC, and All  
7 Things Ali, LLC. True and correct copies of screenshots from the Florida Secretary  
8 of State website are attached as **Exhibit 5**. Notably, Defendant Frances Agnew’s  
9 “ORC Shop LLC” entity shares a similar name as the ORC Style Guide and ORC  
10 Shop groups, further evidencing Defendant Frances Agnew’s involvement in this  
11 counterfeiting conspiracy.

12 23. Investigator also identified other Facebook profiles that are listed as  
13 administrators of the ORC Style Guide group who are associated with Defendant  
14 Frances Agnew, including “Fran Calista,” “Fran Calista’s Closet,” “Fran N. Agnew,”  
15 and “Fran Agnew.” Based on our investigation, we believe all of these Facebook  
16 profiles belong to Defendant Frances Agnew since the profiles use various aliases  
17 associated with Defendant Frances Agnew and/or are identical to the names of the  
18 entities Defendant Frances Agnew owns and manages.

19 24. Investigator determined that in addition to Defendant Frances Agnew,  
20 Defendants Mr. Colson Agnew, Ms. Ali Feaster, and Ms. Brooke Allen are also  
21 administrators of the ORC Style Guide Facebook group. A true and correct copy of  
22 the list of the ORC Style Guide group administrators is attached as **Exhibit 6**.

23 25. As part of my investigation, I reviewed screenshots of Facebook posts  
24 on the ORC Style Guide group provided by Investigator and KGL. These screenshots  
25 show that Defendants Ali Feaster, Brooke Leann Allen, and Bailey Miller participate  
26 in promoting, selling, or offering for sale of Patagonia counterfeit products in the  
27 ORC Style Guide group. Attached as **Exhibit 17** are true and correct screenshots of  
28 posts promoting counterfeit Patagonia products in the ORC Style Guide group.

1           26. Investigator learned that in an attempt to disguise their counterfeiting  
2 scheme, Defendants sometimes use the abbreviation “Pat” or “Pata” or completely  
3 avoid referencing the products by brand name in the text of the Facebook post.

4           27. As a member of the ORC Style Guide group, Investigator confirmed that  
5 Defendants who post about the products in ORC Style Guide group typically pretend  
6 they are posting “reviews” of the products but in reality, post pictures of the  
7 counterfeit products, and in the comments, direct consumers to online storefronts and  
8 e-commerce websites, such as Shopify, to purchase the products. Defendants also  
9 encourage members of the ORC Style Guide group to join a related Telegram group,  
10 called Shop ORC, where they provide information needed to access the online  
11 storefronts to purchase the counterfeit products. Defendants claim that the products  
12 are offered by “trusted sellers.” Investigator was told or saw that many of the  
13 counterfeit products were often sold out, even after an order was placed.

14           28. Investigator identified posts in ORC Style Guide group by Defendant  
15 Frances Agnew, using her “Fran Calista” profile, encouraging members to join the  
16 related private Telegram group called “Shop ORC” to “find the items.” A true and  
17 correct copy of an example of one of Fran Calista’s Facebook posts is attached as  
18 **Exhibit 7.**

19           29. Investigator became a member of the Shop ORC Telegram group.  
20 Based on our investigation, we determined that the Shop ORC Telegram group has  
21 almost 80,000 members. Our investigation revealed that through this private  
22 Telegram group, Defendants Ms. Ali Feaster, Ms. Brooke Allen, and Ms. Bailey  
23 Miller promote, offer for sale, and/or sell counterfeit Patagonia-branded products. A  
24 true and correct copy of Defendants’ posts from the Shop ORC Telegram group are  
25 attached as **Exhibit 8.**

26           30. Our investigation revealed that Defendants direct members of the  
27 Facebook and Telegram groups to various online stores, generally hosted on the  
28



1 Shopify platform, to purchase the counterfeit products. Defendants provide links to  
2 their online storefronts in the Facebook and Telegram groups discussed above.

3 31. Investigator also determined that Defendants periodically shut down or  
4 disable links to the online storefronts and create new ones with new URLs, in a  
5 further attempt to disguise their counterfeiting scheme.

6 32. Our investigation also revealed that the storefront websites that  
7 Defendants use to sell the counterfeit products list the products using codes and/or  
8 unrelated products, rather than by brand name or product description. I am informed  
9 by Investigator that Defendants continue to use this “code marketing” and continue to  
10 post new Patagonia-branded products for sale. An example showing Defendants’  
11 “code marketing” of an unbranded product is included below:

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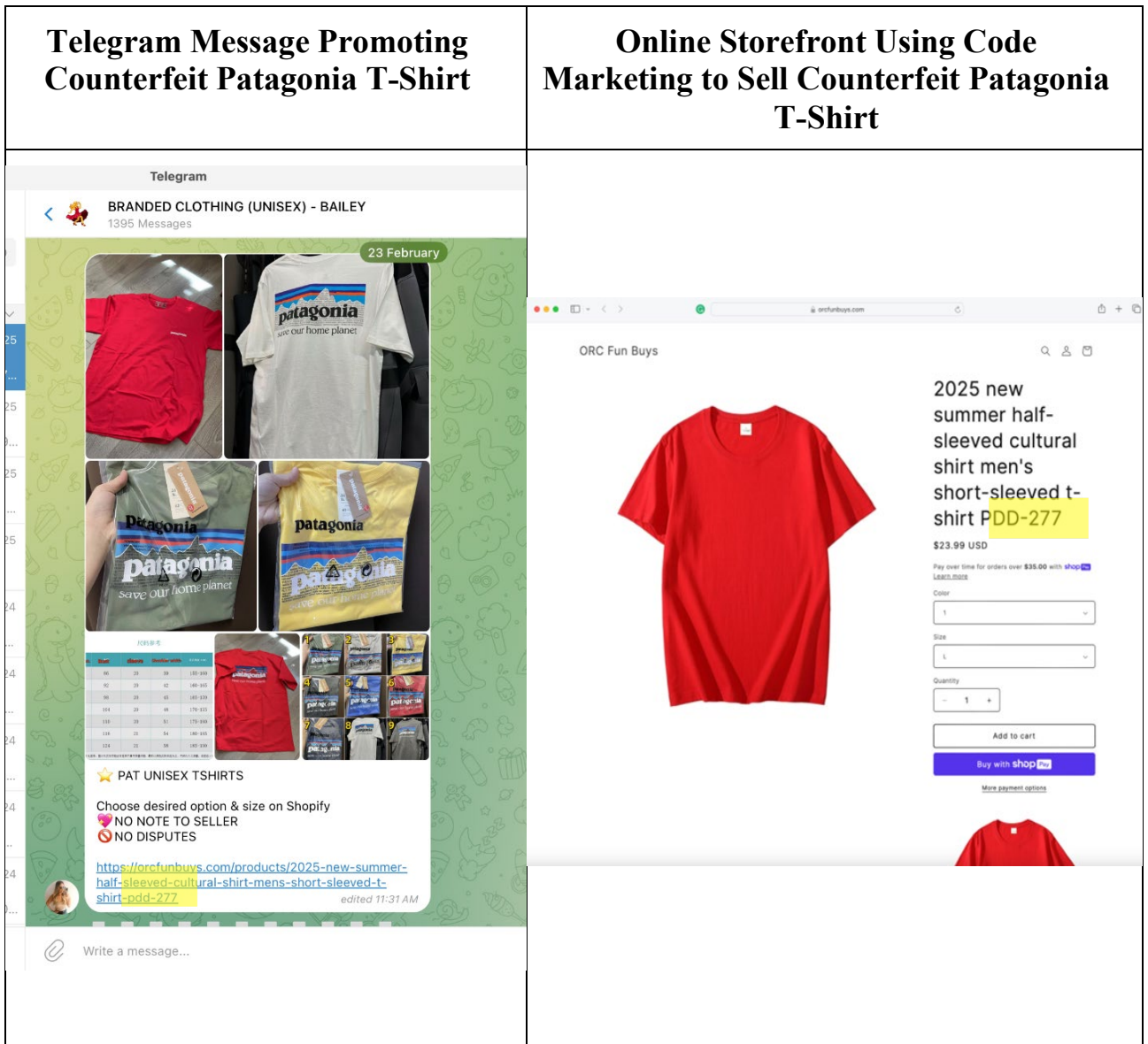
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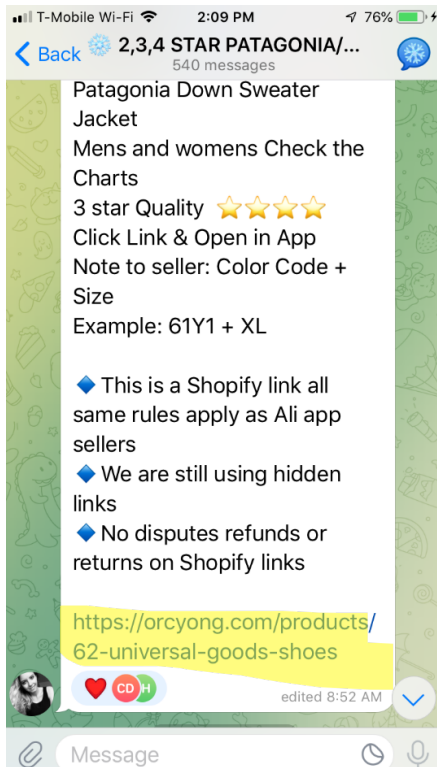
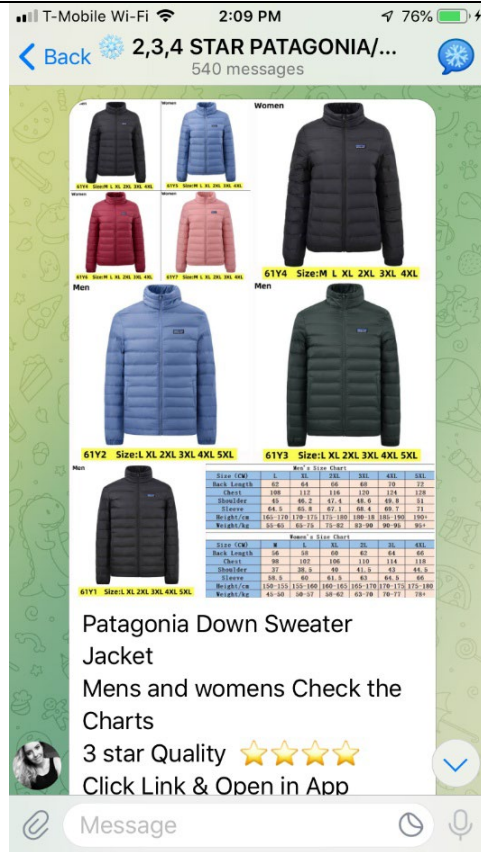
28 //



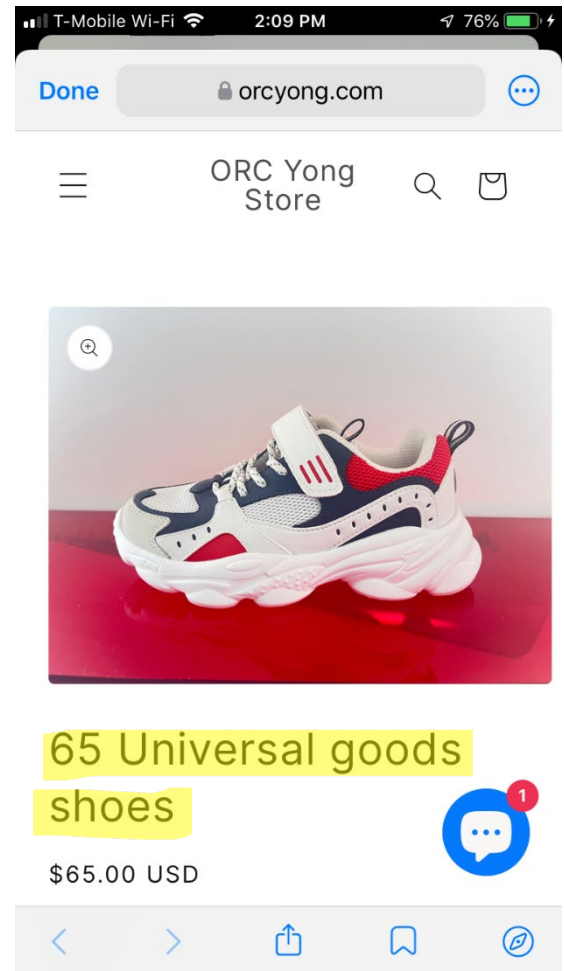


33. An additional example of Defendants’ “code marketing” is shown below. In the private Telegram group, Defendant Brooke Leann Allen promoted a counterfeit Patagonia jacket and provided the URL (highlighted below) to members of the group, including Investigator. The URL to the public storefront referenced “universal-goods-shoes,” not the Patagonia jacket that was promoted to the private Telegram Group. Investigator used the URL, which took Investigator to a listing for the “65 Universal goods” shoe as shown in the image below. Investigator made a purchase from this listing and ultimately received the counterfeit Patagonia jacket that was promoted by Defendant Brooke Leann Allen to the Telegram group.

## Telegram Message Promoting Counterfeit Patagonia Jacket

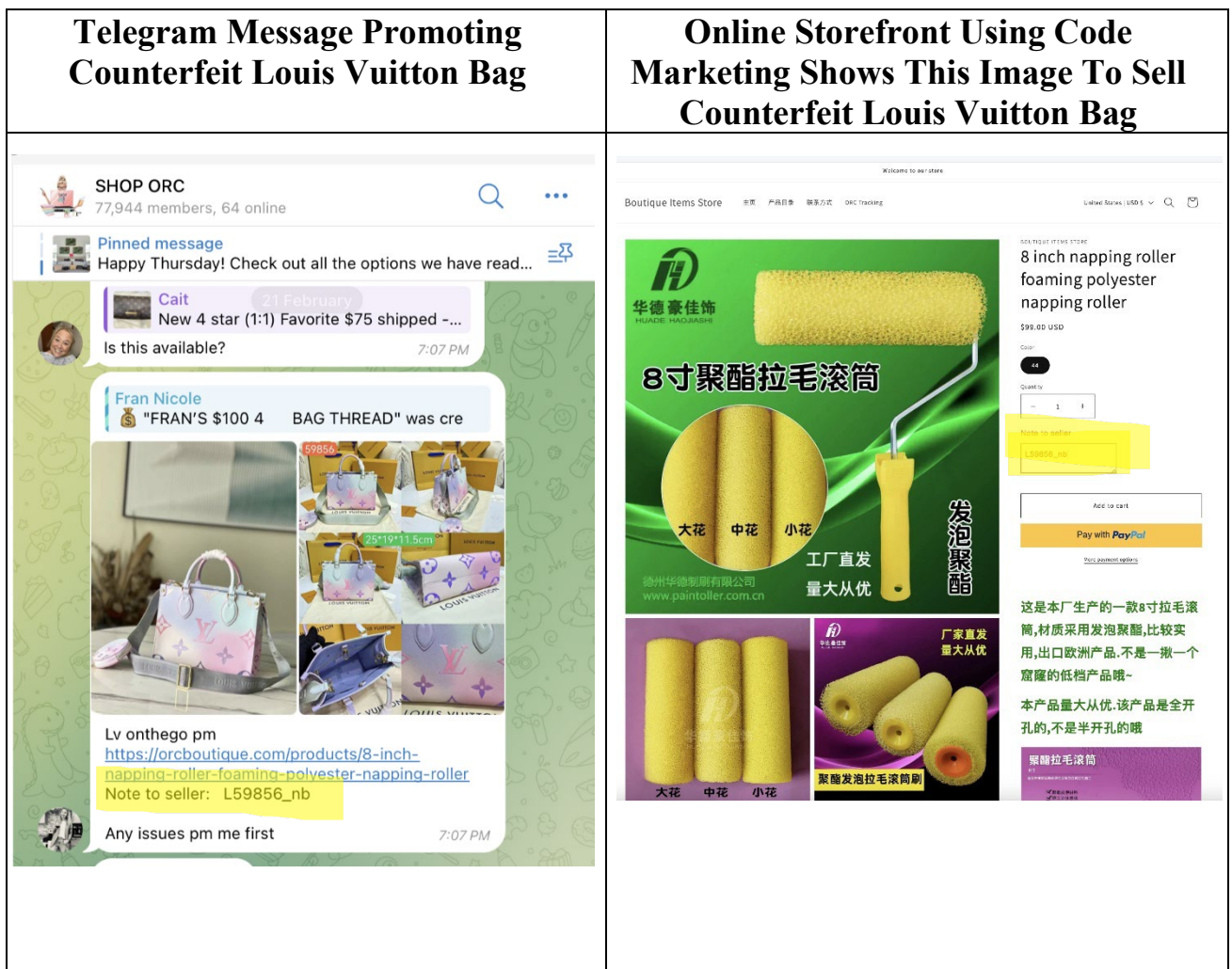


## Online Storefront Using Code Marketing to Sell Counterfeit Patagonia Jacket



True and correct copies of the above screenshots showing Defendants' code-marketing are attached as **Exhibit 9**.

34. Defendants promote other branded products in the same way. Defendant Frances Agnew (aka Fran Nicole) made postings promoting an "Lv onthego PM" bag, showing a photograph of the bag and providing a link in the Shop ORC Telegram group. The link provided in the Telegram group referenced an "8 inch napping roller"—which was also referenced in the product listing on the online storefront Investigator was directed to when they clicked on the link (in the image on the right below). True and correct copies of the below screenshots showing Defendants' code-marketing of the "Lv onthego pm" product are attached as **Exhibit 18**.





35. Patagonia’s investigator purchased this “napping roller” for \$104 on Defendant Frances Agnew’s online storefront, orcboutique.com, hosted on Shopify. The Investigator received the “Lv onthego PM” bag that was promoted in the private Telegram group. Images of the bag Investigator received are shown below and are included in **Exhibit 18**:



36. Below is an online listing for a *used* Louis Vuitton Onthego PM bag, offered with a certificate of authenticity, for \$3550. A true and correct copy of the Fashion Phile listing is attached as **Exhibit 18**.

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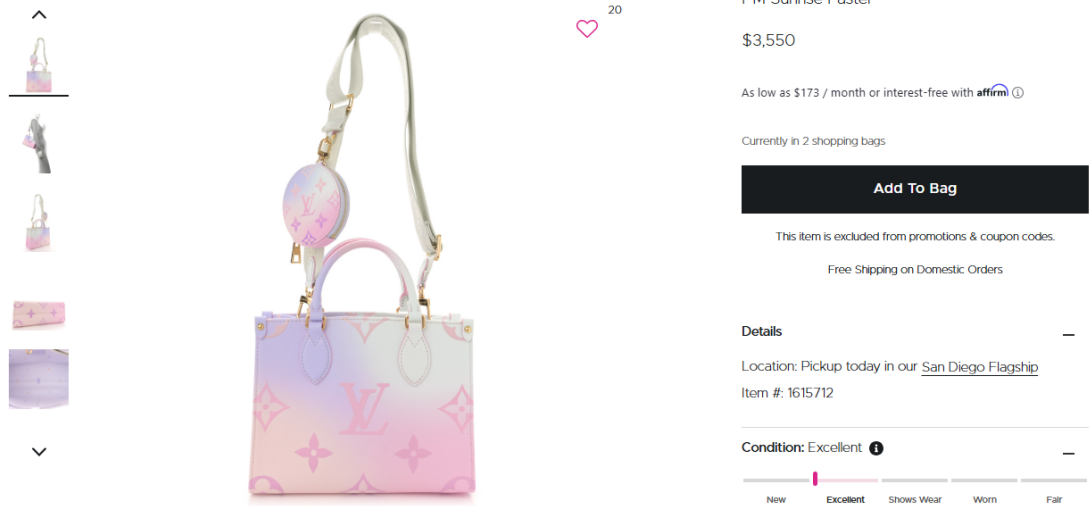
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37. At my direction, Investigator placed purchases for products from Defendants Ali Feaster, Brooke Leann Allen, Bailey Miller, and Frances Agnew. Investigator made these purchases using PayPal but also determined that Defendants’ storefronts accept numerous other payment providers. In connection with making some of the purchases, Investigator communicated with these individuals via the Telegram group. True and correct copies of examples Investigator’s Telegram communications are attached as **Exhibit 10**. I have reviewed each of these communications.

38. On March 6, 2025, Investigator placed an order for a “Patagonia Down Sweater Jacket” for \$69.90 with Defendant Brooke Leann Allen using her online storefront orcyoung.com hosted on Shopify. Investigator used PayPal to make this purchase. Notably, the retail price for an authentic Patagonia Down Sweater Jacket is between \$200-\$400.

39. On March 6, 2025, Investigator placed an order for a “Pat Unisex Tshirt” for \$28.89 with Defendant Bailey Miller using her online storefront orcfunbuys.com hosted on Shopify. Investigator used PayPal to make this purchase. Notably, the retail price for an authentic Patagonia t-shirt is between \$45-\$70.

1           40. On March 6, 2025, Investigator placed an order for a “LV onthego pm”  
2 Louis Vuitton-branded bag for \$104.01 with Defendant Frances Agnew, promoted  
3 under her alias “Fran Nicole.” Investigator used PayPal to make this purchase.

4           41. On March 18, 2025, Investigator placed an order for one “PAT logo  
5 hoodie” for \$35.99 with Defendant Bailey Miller using her online storefront  
6 orcfunbuys.com hosted on Shopify. Investigator used PayPal to make this purchase.  
7 Notably, the retail price for an authentic Patagonia Hoodie Sweatshirt is between  
8 \$89-\$119.

9           42. Also on March 18, 2025, Investigator placed a second order for a three-  
10 pack of “Patagonia Men Underpants 3pcs/lot” for \$39.90 with Defendant Bailey  
11 Miller using her online storefront bwalishop.com hosted on Shopify. Investigator  
12 used PayPal to make this purchase. Notably, the retail price for one authentic  
13 Patagonia underwear is \$35 (\$105 for three units).

14           43. On March 27, 2025, Investigator received the “Patagonia Down Sweater  
15 Jacket” they ordered on March 6 from Defendant Brooke Leann Allen. The jacket  
16 was shipped to Investigator in Southern California. True and correct copies of  
17 Defendant Brooke Leann Allen’s promotion of the Patagonia Down Sweater Jacket  
18 on the Shop ORC Telegram group, the listing for the product on her online store, the  
19 receipt for the purchase, and an image of the product received are attached as **Exhibit**  
20 **11.**

21           44. On April 10, 2025, Investigator received the “Patagonia Men Underpants  
22 3pcs/lot,” “Pat Unisex Tshirt,” and “PAT logo hoodie” they ordered on March 6 and  
23 March 18 from Defendant Bailey Miller. The underwear, t-shirt, and hoodie were  
24 shipped to Investigator in Southern California. True and correct copies Defendant  
25 Bailey Miller’s promotion of the “Patagonia Men Underpants 3pcs/lot,” “Pat Unisex  
26 Tshirt,” and “PAT logo hoodie” on the Shop ORC Telegram group, the listing for the  
27 products on her online store, the receipt for the purchases, and images of the products  
28 received are attached as **Exhibit 16.**

1           45. Verso provided photos of the Patagonia-branded jacket, underwear, t-  
2 shirt, and hoodie Investigator received to Patagonia. Upon inspection of the photos,  
3 Patagonia determined that all of the products that Investigator received are indeed  
4 counterfeit products. *See* Declaration of Traci Escamilla in Support of Plaintiff,  
5 Patagonia, Inc.’s Application for Temporary Restraining Order and Order to Show  
6 Cause (“Escamilla Decl.”) ¶ 27.

7           46. The counterfeit Patagonia products being promoted by Defendants in the  
8 Facebook and Telegram groups are visually identical and compete with authentic  
9 goods sold by Patagonia. Patagonia has not authorized Defendants’ counterfeit sales  
10 of Patagonia-branded products.

11           47. The shipping labels for Patagonia products purchased by Investigator  
12 from various Defendants identify two warehouses in Los Angeles as the shippers.  
13 Based on our investigation, we believe the Los Angeles warehouses are the  
14 warehouses that Defendant Frances Agnew and other Defendants use to store and  
15 ship counterfeit products.

16           48. However, we believe the products were originally shipped or sourced  
17 from China. This is, in part, based on the fact that the return instructions provided on  
18 some of the online storefronts used to purchase the products identify a return address  
19 located in China. True and correct copies of the shipping labels and the return  
20 instructions provided on the online storefronts are attached as **Exhibit 12**.

21           49. One of the shipping labels received by Investigator for two of the  
22 counterfeit Patagonia products identified “Peter Wang” as the shipper with a  
23 corresponding address at 5353 W. Imperial Hwy., Los Angeles, CA 90045. Based on  
24 our investigation, Peter Wang appears to be a convicted counterfeiter. Attached as  
25 **Exhibit 19** is a true and correct copy of an article published by U.S. Immigration and  
26 Customs Enforcement regarding Mr. Wang’s conviction. The article also discusses  
27 Mr. Wang’s use of code marketing or product-mislabeling to sell counterfeit  
28 products—which resembles the marketing tactics used by Defendants in this matter.



1           50. I reviewed the PayPal transaction receipts from the Investigator's  
2 purchases of counterfeit products. The receipts revealed additional individuals and  
3 entities involved in the sale and promotion of counterfeit products. True and correct  
4 copies of the PayPal transaction receipts are attached as **Exhibit 13**. For example,  
5 these receipts identified additional sellers of counterfeit products, including:

- 6           • Defendant Shop ORC LLC, an entity owned by Defendant Frances  
7 Agnew (aka Fran Calista) and managed by her son, Defendant Colson  
8 Agnew;
- 9           • Defendant Jeffrey Moore, the partner/spouse of Defendant Frances  
10 Agnew;
- 11           • Defendant Lee William (an individual about whom we have yet to find  
12 any information)<sup>2</sup>; and
- 13           • Two Chinese sellers, Defendant Putian Co. and Fan Jun (an  
14 individual/entity about whom we have yet to find any information)

15           51. Given the number of individuals and entities involved in this  
16 counterfeiting scheme, I have included charts below summarizing each Defendants'  
17 role in this operation based on the investigations conducted by Verso and  
18 Investigator:

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27 <sup>2</sup> PayPal receipts from Investigator's purchases from multiple Defendants identify  
28 Lee William as the seller, further leading us to believe that the Defendants are  
conspiring with one another in this counterfeiting operation.

**Defendants who have promoted counterfeit products on closed social media groups**

<b>Defendant's Name</b>	<b>Defendant's Physical Address / Associated Email Address(es)<sup>3</sup></b>	<b>Social Media Group</b>
Frances Agnew (aka Fran Calista or Fran Nicole)	2707 Skimmer Point Way S, Gulfport, Florida 33707  orcboutique.com@contactprivacy.com	ORC Style Guide (Facebook) Shop ORC (Telegram)
Alison Rae Feaster	5505 High Bank Rd, Fort Worth, Texas 76126  1253534226@qq.com store+82081906990@t.shopifyemail.com leeo246889@gmail.com 1983630058@qq.com ali-ali1shop.com@contactprivacy.com	ORC Style Guide (Facebook) Shop ORC (Telegram)
Brooke L. Hunsucker (dba Brooke Leann Allen)	1203 62nd St, Meridian, Mississippi 39305  leeo246889@gmail.com cy710303125@gmail.com 532662123@qq.com	ORC Style Guide (Facebook) Shop ORC (Telegram)
Bailey Renae Miller	6400 Aster Ave, Midland, Texas 79707	ORC Style Guide (Facebook) Shop ORC (Telegram)
Colson Ty Agnew	6150 Gulfport Blvd. S. Apartment 406, Gulfport, Florida 33707	ORC Style Guide (Facebook)

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<sup>3</sup> Multiple Defendants are associated with the same email addresses. These email addresses were included on purchase receipts and order confirmation emails, along in connection with some of the online Shopify stores, for each respective Defendant listed.

**Defendants who have provided link(s) in the closed social media groups  
to their online storefronts to purchase counterfeit products**

<b>Defendant's Name</b>	<b>Defendant's Physical Address / Associated Email Address</b>	<b>Defendant's Online Store(s)</b>
Frances Agnew (aka Fran Calista or Fran Nicole)	2707 Skimmer Point Way S, Gulfport, Florida 33707  orcboutique.com@contactprivacy.com	Shopify: www.super-elevenshop.com https://orcboutique.com
Alison Rae Feaster	5505 High Bank Rd, Fort Worth, Texas 76126  1253534226@qq.com store+82081906990@t.shopifyemail.com leeo246889@gmail.com 1983630058@qq.com ali- alilshop.com@contactprivacy.com	Shopify: www.ali-alilshop.com; https://coco-cocoshop.com/ https://mnfindshop.com
Brooke L. Hunsucker (aka Brooke Leann Allen)	1203 62nd St, Meridian, Mississippi 39305  leeo246889@gmail.com cy710303125@gmail.com 532662123@qq.com	Shopify: www.orcyong.com; https://coco-cocoshop.com/
Bailey Renae Miller	6400 Aster Ave, Midland, Texas 79707  leeo246889@gmail.com Store+86404071703@t.shopifyemail.com 352114907@qq.com 276610074@qq.com orcfunbuys@gmail.com	Shopify: www.bwalishop.com ; www.orcfunbuys.com
Colson Ty Agnew	6150 Gulfport Blvd. S. Apartment 406, Gulfport, Florida 33707	Shopify: www.kalvins.shop

**Defendants who are identified as sellers on PayPal receipts for test purchases of the counterfeit products conducted by Investigator**

<b>Defendant's Name</b>	<b>Defendant's Physical Address / Associated Email Address</b>	<b>Defendant's Online Store(s) Used to Make Purchases</b>
Lee William	No physical address found leeo246889@gmail.com 276610074@qq.com	www.ali-ali1shop.comwww.bwalishop.com
Shop ORC LLC	6150 Gulfport Blvd, Apt. 406, Gulfport, Florida 33707  Store+69074223358@t.shopifyemail.com orcfunbuys@gmail.com	www.orcfunbuys.com
Jeffrey Moore	2707 Skimmer Point Way S, Gulfport, Florida 33707  store+24628920367@t.shopifyemail.com orcshopboutique@gmail.com	www.super-elevenshop.com
Putian Lomando Trading Co., Ltd dba Putian Licheng District Gold Carving and Jade Carving Co.	China, Fujian Province, Putian City, Chengxiang District, No. 171, Dongsha Village, Donghai Town, 351100  Leeo246889@gmail.com cy710303125@gmail.com	www.orcyong.com

52. I asked the Investigator to spend one hour reviewing the profiles of the members of the ORC Style Guide Facebook group to confirm that the group includes members located in California. Based on Investigator's brief review, they identified at least 50 members who live in California, indicating that the counterfeit Patagonia products are being promoted and offered to many California residents.

53. Based upon my review of Meta's and Telegram's policies and terms of service, Defendants' activities violate Meta's and Telegram's policies prohibiting

1 illegal activities, products, or services. True and correct copies of Meta's and  
2 Telegram's policies and terms of service are attached as **Exhibit 14**.

3 54. My colleagues and I have advised clients and been involved in numerous  
4 cases against counterfeiters, on behalf of several prominent brands and companies.  
5 Based on my experience, once a counterfeiter, fraudster, or scammer is alerted that  
6 legal action has been commenced, the defendant will likely go underground, taking  
7 the counterfeit inventory, if any, and proceeds of its scheme with them. Based on  
8 prior experience, defendants in a lawsuit like this one are likely to conceal evidence  
9 of their illegal activity by transferring assets or counterfeit products to different  
10 names or entities, and/or destroying important records, files, and/or goods.

11 55. Patagonia and our law firm have invested significant resources to  
12 identify the Defendants and uncover information about their counterfeiting scheme.  
13 To date, our investigation has identified multiple defendants. However, we believe  
14 there are more perpetrators involved in this counterfeiting ring, but we are unable to  
15 identify them without discovery from third party service providers, such as Meta,  
16 Telegram, Shopify, and PayPal.

17 56. Our concern that the identified Defendants will move assets is magnified  
18 by the fact that the alleged ringleader, Defendant Frances Agnew (aka Fran Calista)  
19 appears to have been reported to the Federal Bureau of Investigations ("FBI") for her  
20 prior involvement in importing, promoting, selling, and/or offering for sale  
21 counterfeit products. A true and correct copy of an article discussing Frances  
22 Agnew's prior involvement in counterfeiting and reports to the FBI is attached as  
23 **Exhibit 15**. In addition, Defendants appear to be working with a convicted  
24 counterfeiter, Peter Wang, to distribute the counterfeit products.

25 57. This case is particularly brazen and dangerous to Patagonia's brand and  
26 reputation given the widespread scope and history of this counterfeiting operation.  
27 Based on the investigation, it appears that Defendants have been operating the closed  
28 ORC Style Guide Facebook group since 2016, revealing a long history of operation.

1 Defendants conspire together to promote and sell the counterfeit products, including  
2 by using common social media groups, email addresses, online storefronts,  
3 warehouses, shippers, code-based marketing tactics, and payment mechanisms.  
4 Defendants appear to be experienced counterfeiters, using advanced techniques like  
5 disguising their listings as “reviews,” identifying products by codes rather than  
6 references to brand names, instituting adding freezes when they suspect an infiltrator  
7 has entered the social media group, regularly changing the names of their social  
8 media groups (some of which have hinted at the counterfeiting purpose of the  
9 groups), and disabling links to their public online storefronts and creating new ones.  
10 The ringleader, Defendant Frances Agnew, has been reported to the authorities  
11 previously, and we have reason to believe, based on our investigation, that she is  
12 conspiring with her partner and son to shift assets, entity names, and locations, in  
13 order to avoid detection. She also has contacts with Chinese manufacturers from  
14 whom she sources the counterfeit products.

15 58. If Defendants are given notice, they are very likely to attempt to  
16 circumvent restraining orders and other remedies by disappearing or claiming  
17 ignorance of their responsibilities while simultaneously deleting or destroying  
18 evidence of their counterfeiting scheme and draining their financial accounts. There is  
19 also a high risk that evidence will be hidden or destroyed since the counterfeit goods  
20 at issue are apparel and accessories, which are easy to move and conceal.  
21 Accordingly, any order other than an *ex parte* order without prior notice is unlikely to  
22 achieve the purposes of the relief prescribed by the Lanham Act.

23 59. In my experience, Patagonia will continue to suffer substantial,  
24 irreparable harm to its reputation and its relationship with consumers if the Court  
25 does not issue such an order. It is also my experience that a scheme like this diverts  
26 individuals who otherwise would have purchased a genuine product from Patagonia,  
27 further magnifying the harm to Patagonia.

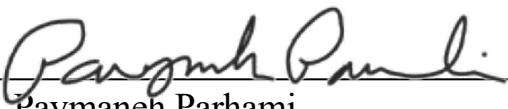
1           60. In order to preserve both evidence and the financial status quo,  
2 Patagonia should be permitted to serve the Order on third parties whose services and  
3 participation are essential to Defendants ongoing violations.

4           61. Given that the only harm Defendants will suffer is lost profits from  
5 continuing their counterfeiting operation, the Court should not require a bond.

6           62. Some of the exhibits attached to this Declaration contain minor  
7 redactions to protect personal identifying information (names, phone numbers,  
8 addresses and email addresses) belonging to the Investigator and KGL.

9           63. Neither I, nor anyone else at Patagonia or Verso, to the best of my  
10 knowledge, have publicized this *Ex Parte* Application or Patagonia's intent to seek  
11 entry of a temporary restraining order against the Defendants to any third party.  
12 I declare under penalty of perjury under the laws of the United States of America that  
13 the foregoing is true and correct.

14           Executed on April 15, 2025, in Princeville, Hawaii.

15  
16 By:   
17 Paymaneh Parhami  
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